

EXHIBIT 2

Cadena, Maria
L.C., a minor v. State of California

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
Case No.: 5:22-cv-00949-KK-(SHKx)

L.C., a minor by and through her
guardian ad litem Maria Cadena,
individually and as
successor-in-interest to Hector
Puga; I.H., a minor by and through
his guardian ad litem Jasmine
Hernandez, individually and as
successor-in-interest to Hector
Puga; A.L., a minor by and through
her guardian ad litem Lydia Lopez,
individually and as
successor-in-interest to Hector
Puga; and ANTONIA SALAS UBALDO,
individually,

Plaintiffs,

v.

STATE OF CALIFORNIA; COUNTY OF
SAN BERNARDINO; S.S.C., a nominal
defendant; ISAIAH KEE; MICHAEL
BLACKWOOD; BERNARDO RUBALCAVA;
ROBERT VACCARI; JAKE ADAMS; and
DOES 6-10, inclusive,

Defendants.

VIDEOTAPED VIDEOCONFERENCE DEPOSITION OF MARIA CADENA

Wednesday, December 11, 2024, 1:04 p.m.

Taken remotely via Zoom

REPORTED BY: Mary P. Randle, CSR No. 10312

1 APPEARANCES:

2 (Appearances via videoconference)

3
4 For Plaintiffs:

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14 and Jake Adams:

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23 For Defendants State of California by and through
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Also Present:

Vionela Vaughn-Austin, Videographer

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1 TAKEN REMOTELY VIA ZOOM

2 WEDNESDAY, DECEMBER 11, 2024

3 1:04 P.M.

4
5 THE VIDEOGRAPHER: Good afternoon. This is the
6 video deposition of Maria Cadena, taken remotely on
7 December 11, 2024, in the matter of L.C. versus State of
8 California, Case Number 5:22-cv-004 -- pardon me --
9 52 -- 5:22-cv-00949-KK-(SHKx). This case is being heard
10 in the United States District Court of Central District
11 of California. The deposition is on the behalf of the
12 Defendant.

13 My name is Vionela Vaughn-Austin, and I'm the
14 legal videographer contracted through Dean Jones Legal
15 Videos, Inc., of Los Angeles and Santa Ana, California.
16 Now, because we're not in person, I, as the
17 videographer, may have to interrupt the proceedings if
18 the deponent drifts out of the frame or should any
19 connectivity issues occur with the Zoom.

20 This deposition is commencing at 1:04 p.m.
21 Would all present please identify yourselves, starting
22 with the court reporter, then the deponent, and then
23 counsel.

24 THE COURT REPORTER: Mary Randle on behalf of
25 Jilio-Ryan Court Reporters.

**Cadena, Maria
L.C., a minor v. State of California**

1 MS. GUSTAFSON: Can you state your name?

2 THE WITNESS: Oh, me?

3 THE VIDEOGRAPHER: Maria, would you please
4 state your name.

5 THE WITNESS: Sure. Maria Cadena.

6 MS. GUSTAFSON: Shannon Gustafson on behalf of
7 the County Defendants.

8 MS. ESQUIVEL: Diana Esquivel on behalf of the
9 State Defendants.

10 MS. LE: Hang Le on behalf of the Deponent and
11 the Plaintiffs in L.C. versus State of California.

12 THE VIDEOGRAPHER: Thank you. Now, would the
13 court reporter please administer the oath.

14

15 MARIA CADENA,

16 having been first duly sworn, was examined and

17 testified as follows:

18

19 EXAMINATION

20 BY MS. GUSTAFSON:

21 Q Can you please state your name for the record.

22 A Maria Cadena.

23 Q Have you ever used any name other than

24 Maria Cadena?

25 A No.

1 and Hector ended your relationship?

2 A The beginning. I was about a month pregnant.

3 Q And what was the reason your relationship with
4 Mr. Puga ended?

5 A We just didn't get along anymore.

6 Q Any other reason?

7 A No. He -- well, besides that, because he was
8 going out too much.

9 Q When you say, "going out too much," how often
10 did he go out?

11 A All day, every day.

12 Q And did he drink when he went out?

13 A Yes.

14 Q And was -- did you -- from your observations of
15 Mr. Puga when you were in a relationship with him, was
16 he a heavy drinker?

17 A Yes.

18 Q Was he often drunk?

19 A Yes.

20 Q What was his demeanor like when he was drunk?

21 A He was just, like, always sad. I would say
22 always sad.

23 Q Did he ever get angry?

24 A At himself.

25 Q What about at you?

1 Q After Hector moved out of your residence in
2 Long Beach, do you know any places that he lived?

3 A No.

4 Q Do you know if he ever lived in the city of
5 Hesperia?

6 A No.

7 Q Do you know if he had any friends in the city
8 of Hesperia?

9 A No.

10 Q You said earlier that Hector was a heavy
11 drinker. Did -- was that one of the reasons you ended
12 the relationship with him?

13 A Yes.

14 Q Did you ever see him use drugs?

15 A No.

16 Q Did he ever tell you that he used drugs?

17 A No.

18 Q Did anybody else tell you that he used drugs?

19 A No.

20 Q When -- or strike that.

21 To your knowledge, has Hector ever been
22 married?

23 A No. That I know of, no.

24 Q Do you know an individual by the name of
25 Yobanna Puga?

1 A Yeah.

2 Q Did those happen frequently?

3 A Yes.

4 Q And would he typically be drinking during those
5 arguments or they would just happen at other times as
6 well?

7 A It was both, when he wasn't drinking and when
8 he was drinking.

9 Q Was there anything in particular that the two
10 of you would fight about?

11 A No. He was just a very jealous person.

12 Q Did you ever have any issues with him being
13 around other women when he was with you?

14 A No.

15 Q As you sit here today, do you know if Hector's
16 ever been arrested?

17 A No.

18 Q Do you know if he ever spent any time in prison
19 or jail?

20 A No.

21 Q Did you ever hear about an incident where he
22 was in a pursuit with L.A. Sheriff's Department and he
23 fired a gun at them?

24 A Yes.

25 Q How did you find out about that incident?

1 Q And what about before Hector died? When was
2 the last time that you let Antonia see Layla before
3 Hector's death?

4 A I don't recall, but I would say Layla was
5 probably about four. Maybe four years old.

6 Q So, to the best of your recollection, the last
7 time that Layla saw Antonia before Hector's death, she
8 was about four years old?

9 A Yes.

10 Q And it's your recollection that -- or to the
11 best of your recollection, you've allowed Antonia to see
12 Layla about seven times?

13 A Yes.

14 Q What was the reason you did not let Hector see
15 Layla?

16 A It's just that we didn't get along and I just
17 didn't want her to be around her [sic].

18 Q Did you think Hector would be a bad influence
19 on Layla?

20 A No.

21 Q Were you concerned about his drinking if he was
22 around Layla?

23 A Yes.

24 Q Were you concerned that -- about his conduct
25 related to getting into the shooting with L.A. Sheriff's

1 know of any reason why he would run from police?

2 A No.

3 Q Did he ever share with you what his views on
4 law enforcement were?

5 A No.

6 Q Did you ever find out -- or strike that.
7 Outside of anything you've heard from your
8 attorneys, were you aware whether Hector had a gun that
9 night?

10 A No.

11 Q Have you learned from anybody that -- other
12 than your attorneys -- that Hector -- the car that
13 Hector drove had been involved in a shooting earlier,
14 before the pursuit?

15 A No.

16 Q Did anybody ever tell you that Mr. Puga was
17 drinking and throwing beer cans out of the car when
18 police were trying to get him out of the vehicle?

19 A No.

20 Q Have you learned -- ever learned that there was
21 methamphetamine in his system at the time he died?

22 A No.

23 Q Has anyone ever told you that there were
24 syringes found in the car?

25 A No.

DECLARATION

I herby declare I am the deponent in the within
matter; that I have read the foregoing deposition and
know the contents thereof; and I declare that the same
is true of my knowledge except as to the matters which
are therein stated upon my information or belief, and as
to those matters, I believe it to be true.

I declare under the penalties of perjury of the
State of California that the foregoing is true and
correct.

Executed on the _____ day of _____, _____, at
_____, _____.
(City) (State)

MARIA CADENA

1 STATE OF CALIFORNIA)
2)
3 COUNTY OF SAN DIEGO)
4

5 I, Mary P. Randle, Certified Shorthand
6 Reporter in and for the State of California,
7 Certificate No. 10312, do hereby certify:

8 That prior to being examined, the witness named
9 in the foregoing deposition was by me first duly sworn
10 to testify to the truth, the whole truth, and nothing
11 but the truth;

12 That said deposition was taken remotely before
13 me at the time and place therein set forth and was taken
14 down by me in shorthand and thereafter transcribed into
15 typewriting under my direction and supervision;

16 I further certify that I am neither counsel for,
17 nor related to, any party to said action, nor in any way
18 interested in the outcome thereof.

19 In witness whereof, I have hereunto subscribed my
20 name.

21 Dated: December 22, 2024
22

23 Mary Randle, CSR#10312
24 MARY P. RANDLE
25 CSR No. 10312